

## **EXHIBIT G**

1 FILED  
2 2019 JAN 30 09:00 AM  
3 KING COUNTY  
4 SUPERIOR COURT CLERK  
5 E-FILED  
6 CASE #: 19-2-01930-1 KNT

The Honorable Andrea Darvas

7 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
8 IN AND FOR THE COUNTY OF KING

9 MICAELA RENOJ PEREZ, an  
10 individual,

Plaintiff,

11 v.  
12 CITY OF TUKWILA, d/b/a TUKWILA  
13 POLICE DEPARTMENT, a local  
14 government entity; and BRENT FRANK,  
15 an individual,

Defendants.

No. 19-2-01930-1 KNT

**NOTICE OF REMOVAL**

**[CLERK'S ACTION REQUIRED]**

16 TO: CLERK OF THE COURT,  
17 AND TO: MICAELA RENOJ PEREZ, an individual, Plaintiff;  
18 AND TO: Eric S. Nelson, Attorneys for Plaintiff

19 COMES NOW the Defendants, City of Tukwila, d/b/a Tukwila Police Department  
20 and Brent Frank, by and through its attorneys of record, Richard B. Jolley of Keating,  
21 Bucklin & McCormack, Inc., P.S., and hereby remove to the U.S. District Court, Western  
22 District of Washington at Seattle, the State court action described below.

23 1. On or about January 18, 2019, the Plaintiff, Micaela Renoj Perez,  
24 commenced an action in the Superior Court of the State of Washington in and for KING,  
25 captioned *Micaela Renoj Perez v. City of Tukwila, d/b/a Tukwila Police Department, a local*  
26 *government entity; and Brent Frank, an individual* (hereinafter "Complaint"). A true and  
27

1 correct copy of the *Complaint* is attached to this Notice of Removal and marked as **Exhibit**  
2  
3 A. A copy of the *Complaint* is also included in the documents submitted with the  
4 Verification of Counsel. In Count IV, V and VI of the *Complaint*, Plaintiff alleges an  
5 excessive force and Monell claim against Defendants pursuant to 42 U.S.C. § 1983, which  
6 creates removal jurisdiction to federal court on a federal question basis.

7 2. With the filing of this Notice of Removal with the U.S. District Court, the  
8 Defendants will pay the \$400 Federal Court filing and removal fee.

9 3. Because this matter is subject to nondiscretionary removal to the U.S. District  
10 Court, and this Notice of Removal has been timely filed, the instant lawsuit which is filed in  
11 the King Superior Court – the county Superior Court embraced by the District Court for the  
12 Western District of Washington – should be immediately removed to the District Court.

13 DATED: January 30, 2019

14 KEATING, BUCKLIN & McCORMACK, INC., P.S.

15 By: /s/ Richard B. Jolley  
16 Richard B. Jolley, WSBA #23473  
17 Attorneys for Defendants

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19 Seattle, WA 98104-1518  
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## **DECLARATION OF SERVICE**

I declare under penalty of perjury under the laws of the State of Washington that on January 30, 2019, a true and correct copy of the foregoing was served upon the parties listed below via the method indicated:

**Attorneys for**

Eric S. Nelson, WSBA #22065  
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- E-mail
  - United States Mail
  - Legal Messenger
  - Other Agreed E-Service

DATED this 30th day of January, 2019, at Seattle, Washington.

/s/ Christine Jensen Linder  
Christine Jensen Linder, Legal Assistant